

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

CITIMORTGAGE, INC.

Plaintiff

v.

C.A. No. 19-cv-00604-MSM

PAUL O. BOGHOSSIAN, III; DAVID M. BOGHOSSIAN;;  
DAVID M. BOGHOSSIAN, TRUSTEE OF THE  
ALEXANDER CHANDLER BOGHOSSIAN TRUST;  
DAVID M. BOGHOSSIAN, TRUSTEE OF THE  
ELIZABETH ALDEN BOGHOSSIAN TRUST; DAVID  
M. BOGHOSSIAN, TRUSTEE OF THE CHRISTOPHER  
CUSHMAN BOGHOSSIAN TRUST; DAVID M.  
BOGHOSSIAN, CUSTODIAN UNDER RHODE ISLAND:  
UNIFORM TRANSFERS TO MINORS ACT FOR  
ALEXANDER CANDLER BOGHOSSIAN; DAVID M.  
BOGHOSSIAN, CUSTODIAN UNDER RHODE ISLAND:  
UNIFORM TRANSFERS TO MINORS ACT FOR  
CHRISTOPHER CUSHMAN BOGHOSSIAN;  
DAVID M. BOGHOSSIAN, CUSTODIAN UNDER  
RHODE ISLAND UNIFORM TRANSFERS TO MINORS:  
ACT FOR ELIZABETH ALDEN BOGHOSSIAN;  
AND JENNIFER C. BOGHOSSIAN

Defendants

**JOINT MOTION TO STAY PROCEEDINGS**

Plaintiff CitiMortgage, Inc. (“Plaintiff”) and Defendants jointly move this Court to stay all proceedings through June 2, 2021. The Defendants have entered into a contract to sell the subject property in an amount sufficient to pay off Plaintiff’s mortgage. The contract requires the closing to occur on or before June 1, 2021. The real estate agent reported that the inspections are complete and the buyers intend to proceed with the sale. The parties therefore request that this Court stay this foreclosure action to allow the Defendants to complete the sale.

Plaintiff respectfully reserves the right to move to vacate the stay if it believes that the buyers are not proceeding with the sale. Additionally, the parties request that Plaintiff have 14

days from the date the stay expires to respond or object to the Second Set of Requests for Admissions served by the Defendants, which were due on March 26, 2021, but were stayed until 14 days after the stay expires, which is currently May 7, 2021. The parties further request that all other discovery deadlines will close 30 days from the date the stay expires.

WHEREFORE, the parties respectfully request that the Court stay this matter through June 2, 2021.

PLAINTIFF  
CITIMORTGAGE, INC.  
By its Attorneys,

/s/ Jeffrey C. Ankrom  
Joseph A. Farside, Jr., Esq. (#7559)  
Krystle G. Tadesse, Esq. (#7944)  
Jeffrey C. Ankrom, Esq (#7663)  
LOCKE LORD LLP  
2800 Financial Plaza  
Providence, RI 02903  
(401) 274-9200  
(401) 276-6611 (fax)  
joseph.farside@lockelord.com  
krystle.tadesse@lockelord.com  
jeffrey.ankrom@lockelord.com

DEFENDANTS  
By Their Attorney,

/s/ John B. Ennis  
John B. Ennis, Esq. (#2135)  
1200 Reservoir Ave.  
Cranston, RI 02920  
Phone: (401) 943-9230  
Jbelaw75@gmail.com

Dated: April 23, 2021

### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the 23rd day of April, 2021, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be mailed to those indicated as non-registered participants.

/s/ Jeffrey C. Ankrom